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August 10, 2012

**BY ELECTRONIC MAIL**

Honorable Alison J. Nathan  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Oba Hassan Wat Bey, et al. v. City of New York, et al.,  
Civil Action Nos. 99 Civ. 3873; 01 Civ. 9406

Dear Judge Nathan:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced consolidated action. By Order, dated August 2, 2012, the Court directed Ms. Thomas, counsel for four of the seven plaintiffs, to submit a Proposed Amended Complaint complying with the Court's Order, dated July 19, 2012. The July 19<sup>th</sup> Order permitted an amended complaint that solely asserted a Title VII claim for Plaintiff Wat Bey (p/k/a Robert Watson). The Court had rejected prior proposed amended complaints, as they either (1) altered facts or (2) implied Title VII claims for plaintiffs other than Plaintiff Wat Bey.

On August 2<sup>nd</sup>, Ms. Thomas submitted a Proposed Amended Complaint, a copy of which is attached hereto. The Court has directed defendants to inform the Court whether this most recent Proposed Amended Complaint conforms with the Court's July 19<sup>th</sup> Order. Defendants believe that it does. Defendants note, however, that the Proposed Amended

**HONORABLE ALISON J. NATHAN**

United States District Judge

Wat Bey, et al. v. City, et al.,

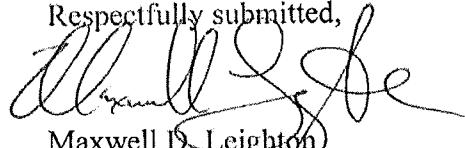
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Complaint repeatedly refers to the plural "plaintiffs," such as in the opening and concluding paragraph, and in paragraphs "23," "49," "50," "51," 70," "76," "85," "88," "89," and "113," rather than, as is otherwise found throughout, the singular "plaintiff," referring solely to Plaintiff Wat Bey.

Respectfully submitted,



Maxwell D. Leighton  
Assistant Corporation Counsel

cc: Irene Donna Thomas, Esq. (*via* email at [ithomas20@aol.com](mailto:ithomas20@aol.com))  
David Schlachter, Esq. (*via* email at [ds6848@aol.com](mailto:ds6848@aol.com))